

BROOKS R. BROWN (SBN 250724)
bbrown@goodwinprocter.com
GOODWIN PROCTER LLP
601 S. Figueroa St., 41st Floor
Los Angeles, CA 90017
Tel.: 213.426.2500
Fax.: 213.623.1673

Attorneys for Defendants

JULIO J. RAMOS (SBN 189944)
ramosfortrustee@yahoo.com
LAW OFFICES OF JULIO J. RAMOS
35 Grove Street, Suite 107
San Francisco, CA 94102
Tel. 415.948.3015
Fax. 415.469.9787

Attorneys for Plaintiff

[*ADDITIONAL COUNSEL LISTED IN SIGNATURE
BLOCK*]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MANUEL CABRERA individually and behalf
of the general public and a class of similarly
situated,

Plaintiff,

v.

COUNTRYWIDE HOME LOANS INC. d/b/a
America's Wholesale Lender; BANK OF
AMERICA INC.; BAC HOME LOAN
SERVICING LP f/k/a Countrywide Home
Loans Servicing LP,

Defendants.

Case No. 3-11-cv-04869-SI

**STIPULATION REGARDING DISMISSAL
OF SECOND AMENDED COMPLAINT
WITH PREJUDICE AND ~~[PROPOSED]~~
ORDER**

Courtroom: 10
Judge: Hon Susan Illston
450 Golden Gate Avenue
San Francisco, CA 94102

STIPULATION

This Civil Action having come before the Court on the pleadings and proceedings of record, and it being represented to the Court that plaintiff Manuel Cabrera (“Cabrera”) and all defendants in this matter have entered into an agreement that resolves all claims asserted in this action, and by consent of the parties, IT IS HEREBY ORDERED that all of Cabrera’s claims against all defendants are hereby dismissed with prejudice.

IT IS SO STIPULATED.

Respectfully submitted,

Dated: August 8, 2013

By: /s/ Julio J. Ramos
JULIO J. RAMOS
ramosfortrustee@yahoo.com
LAW OFFICES OF JULIO J. RAMOS
35 Grove Street, Suite 107
San Francisco, CA 94102
Tel. 415.948.3015
Fax. 415.469.9787

STEVEN M. NUÑEZ (SBN 185421)
steve@wardhagen.com
WARD & HAGEN, LLP
440 Stevens Avenue, Suite 350
Solana Beach, CA 92075
Tel. 858.847.0505
Fax. 858.847.0105

AMY HARRINGTON (SBN 237980)
amy@amyharringtonlaw.com
LAW OFFICE OF AMY HARRINGTON
35 Grove Street, Suite 117
San Francisco, CA 94102
Tel: 415.558.7700
Fax: 415.558.7702

Attorneys for Plaintiff:
Manuel Cabrera

Dated: August 8, 2013

By: /s/ Brooks R. Brown
BROOKS R. BROWN
bbrown@goodwinprocter.com
GOODWIN PROCTER LLP
601 S. Figueroa St., 41st Floor
Los Angeles, CA 90017
Tel.: 213.426.2500

Fax.: 213.623.1673

ROBERT B. BADER (SBN 233165)
rbader@goodwinprocter.com
GOODWIN PROCTER LLP
Three Embarcadero Center, 24th Floor
San Francisco, CA 94111
Tel: 415.733.6000
Fax: 415.677.9041

MATTHEW S. SHELDON (admitted pro hac vice)
msheldon@goodwinprocter.com
DANIEL E. ZYTNIK (admitted pro hac vice)
dzytnick@goodwinprocter.com
GOODWIN PROCTER LLP
901 New York Avenue, N.W.
Washington, DC 20001
Tel.: 202.346.4000
Fax: 202.346.4444

Attorneys for Defendants

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 8 / 9, 2013



HON SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE

ATTESTATION OF SIGNATURE

(N.D. Cal. General Order No. 45)

Pursuant to N.D. Cal. General Order No. 45 § X(B), I hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained by all the signatories.

/s/ Brooks R. Brown
(Signature)

PROOF OF SERVICE

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on **August 8, 2013**.

/s/ Brooks R. Brown
(Signature)